

REMARKS

I. Office Action Summary

Claims 1-22 are presently pending. Claims 1, 7, and 16 are the independent claims. In the Office Action, the Examiner withdrew as moot previous rejections and has provided a new rejection. Currently, all claims stand rejected as obvious over the newly cited reference to Crockett (US5,590,188).

II. Claim Rejections Under 35 U.S.C. § 103(a)

The Examiner has rejected claims 1-22 as obvious over Crockett.

The Crockett reference discloses a rules-based call routing system. Crockett discusses two embodiments of rules executed by a call routing processor on calls destined for call centers (Col. 5, line 66 – Col. 7, line 9). Crockett only identifies, and repeatedly identifies, interexchange carrier (IXC) switches and 800 (N00) numbers in its examples of how the invention is used. Crockett fails to teach, suggest or disclose handling any local exchange networks or caller-paid telephone calls. Crockett also fails to teach, suggest or disclose any system or method of handling a combination of local exchange network caller-paid calls and interexchange network toll-free calls.

CLAIM 1

Claim 1 expressly calls for a call routing processor in communication with both an interexchange network and a local exchange network and configured to provide routing instructions to each of these networks in response to caller-paid or toll-free calls directed to a call service. As pointed out above, and as noted by the Examiner, Crockett fails to teach a local exchange network. Crockett not only fails to teach a local exchange network, it fails to teach or suggest any reason for including a system for routing caller-paid calls or a combination of a local exchange network and an interexchange network.

The Examiner has suggested that Crockett's teaching of a plurality of call centers and switches somehow expressly means that caller paid calls from local exchange carriers are disclosed, contrary to the sole and consistent disclosure in Crockett of toll-free calls over interexchange carriers (e.g. Col. 1, lines 16-25 and 55-60; Col. 9, lines

16-18 and 61-64; Col. 13, lines 12-15; Col. 14, lines 5-13 and lines 56-64; Col. 15, lines 7-35). Applicants respectfully submit that the Examiner's statement that companies require "locally located customers [to] call the call center using a local number in order to avoid paying for unnecessary 800/toll-free charges" is unsupported by Crockett, unrelated to the teachings in Crockett and fails to strengthen the Examiner's argument. If a local number is required for local call centers as proposed by the Examiner, then further routing of that local call is not contemplated and the Examiner's hypothetical "teaching" still fails to disclose all the elements of claim 1. Claims 2-6 are dependant claims, therefore their allowability directly follows from the allowability of independent claim 1. Reconsideration and allowance of claim 1 is respectfully solicited.

CLAIM 7

Claim 7 is somewhat similar to claim 1 in that it also includes a call control processor configured to receive and respond to routing instruction queries on a call-by-call basis for toll-free calls from interexchange networks and caller-paid calls from local exchange networks. As with claim 1, claim 7 recites a call processor receiving routing queries for each call at the interexchange network and local exchange network and providing individual routing instructions for these calls to the local exchange network and interexchange network, respectively. Accordingly, for at least the same reasons as provided for claim 1, Applicants respectfully submit that independent claim 7 is allowable over the Crockett reference. Claims 8-15 are dependent claims, therefore their allowability directly follows the allowability of independent claim 7.

CLAIM 16

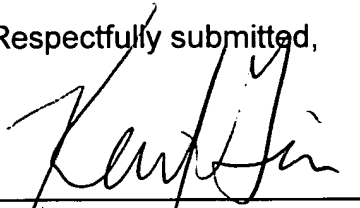
Claim 16 relates to a method of routing caller-paid and toll-free telephone calls directed to a call service. Claim 16 includes, *inter alia*, the step of receiving a caller-paid telephone call at a switch in a local exchange network and requesting call routing instructions from the call routing processor. The Crockett reference not only fails to teach or suggest a local exchange network requesting call routing instructions from the call processor, it completely lacks any teaching of local exchange networks whatsoever. Because the Crockett reference fails to teach or suggest the features of claim 16, Applicants submit that claim 16 is allowable over the art of record. Claims 17-22 are

dependent claims, therefore their allowability directly follows from the allowability of independent claim 16.

III. Conclusion

In light of the above amendments and remarks, Applicants submit that all of the pending claims (1-22) are in condition for allowance. If any questions arise or issues remain, the Examiner is invited to contact the undersigned at the number listed below in order to expedite disposition of this application.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Kent E. Genin", written over a horizontal line.

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